

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

PARENTS DEFENDING
EDUCATION,

Plaintiff,

v.

LINN-MAR COMMUNITY SCHOOL
DISTRICT; SHANNON BISGARD, in
his official capacity as Superintendent of
Linn-Mar Community School District;
BRITTANIA MOREY, CLARK
WEAVER, BARRY BUCHHOLZ,
SONDRA NELSON, MATT
ROLLINGER, MELISSA WALKER,
and RACHEL WALL, in their official
capacities as members of the Linn Marr
Community School District School
Board,

Defendants.

Case No. _____

DECLARATION OF PARENT G

1. I live within the boundaries of the Linn-Mar Community School District (“Linn-Mar”) and am the parent of a school-aged child.
2. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.
3. I am a member of Parents Defending Education.
4. I have a son enrolled at Linn-Mar High School.

5. I have raised my son to believe that biological sex is immutable and does not change based on someone's internal feelings. I have taught my son to be respectful towards others but also to tell the truth and always stand up for his beliefs, even when those beliefs are unpopular.

6. My son believes that people are created either male or female and that a person cannot "transition" from one sex to another. My son knows and interacts with transgender students, and he has no ill-will towards them or any other members of the LGBT community. But my son does not want to be forced to affirm that a biologically female classmate is actually a male, or vice versa. Nor does he want to be forced to call someone a "he" or a "she" (or to use some other form of "preferred pronouns") that contradict his deeply held beliefs.

7. When issues involving gender identity arise (e.g., in class or in school sponsored activities), my child wants to speak about these topics and state his belief that biological sex is immutable.

8. Under the speech policy, however, my son can be disciplined for a number of views he wants to express, such as referring to another student according to their biological sex rather than their gender identity, disagreeing with another student's assertion about whether they are male or female, stating that a biological male who identifies as female should not be allowed to compete in women's sports, or for expressing discomfort about sharing bathrooms with teachers or students of the opposite biological sex.

9. Because of the Policy, my son either remains silent in school environments when gender identity topics arise or avoids using sex-specific pronouns altogether.

10. I want my son to be educated in a challenging environment that involves the open exchange of ideas and to be free to express his beliefs, even if others disagree with those beliefs or find them offensive. I do not want my son to be forced to affirm beliefs about gender identity that are inconsistent with his deeply held convictions.

11. I am concerned that my son will be subjected to formal discipline that will harm his college admission chances and his extracurricular opportunities, unless he affirms ideas that are inconsistent with his deeply held beliefs. I also worry that being disciplined for stating his fundamental beliefs will inflict mental and psychological harm on my child by forcing him to “choose” between expressing the beliefs he has been taught at home and following the instructions of teachers and other Linn-Mar authority figures. Further, I know that the process of repeatedly being subjected to discipline for stating his beliefs will expose my son to reputational harm and personal attacks from other students and members of the Linn-Mar community.

12. I am considering withdrawing my son from Linn-Mar to prevent him from suffering these harms, and others, from the Policy.

13. I am signing this declaration under a pseudonym because I live in Linn-Mar and, if my participation in this litigation becomes public, I fear reprisal from school officials, my child’s teachers and fellow students, and members of the broader community.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 20th day of July, 2022

Parent G Parent G